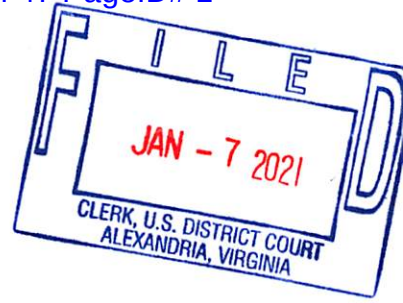


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IN THE UNITED STATES DISTRICT COURT,  
EASTERN DISTRICT OF VIRGINIA

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ALEXANDRIA, VIRGINIA

1:21-CV-25 LMB/MSN

Pro Se

Lama Maksosa

44044 Ferncliff Terrace

Ashburn VA 20147

Plaintiff,

V.

Amazon.com Inc, Amazon Web Services  
Registered Agent  
251 Little Falls Drive, City of Wilmington,  
County of New Castle, State of Delaware 19808

Defendant.

**PLAINTIFF DEMANDS**  
**TRIAL BY JURY**

**COMPLAINT**

Comes now Lama Maksosa (Plaintiff), for her complaint against Defendant,  
Amazon Web Services and Amazon (Defendant) of the city of Herndon, Virginia.

**NATURE OF THE CLAIMS**

Plaintiff, Lama Maksosa, who is Bonafede law-abiding citizen and resident of Virginia,  
Loudoun county is filing complaint against defendant Amazon and its subsidiary  
Amazon Web Services, where the defendant was employed for the past five years  
because of Discriminatory Intent/Treatment which violates title VII of the Civil Rights

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Act of 1964 (Title VII), which prohibits employment discrimination based on race, color, religion, sex or national origin and sexual harassment retaliation per the 1991 amendment to the Title VII of the Act.

### **JURISDICTION AND VENUE**

This court has jurisdiction over this matter pursuant to 28 U.S.C §§ 1331 and 1343 because this action involves federal questions regarding the deprivation of Plaintiff's rights under federal civil rights laws.

Venue is proper for this district pursuant to § 2000-(5)(f)(3), because the unlawful employment practices occurred in this because Amazon Inc and Amazon web services are also located in this district at 4250 Fairfax Dr, Arlington, VA 22203, USA and pursuant to 28 U.S.C. § 1391 (b) defendant is located in this district.

### **PARTIES**

1- Lama Maksosa "PLAINTIFF" is resident of Virginia, Loudoun County, at 44044 Ferncliff Terrace, Ashburn, VA 20147.

2- Amazon Web Services " Defendant", address is 13200 Woodland Park, Herndon VA 20171, and Amazon Headquarter is located at 4250 Fairfax Drive, Arlington, VA.

### **PROCEDURAL REQUIREMENTS**

Plaintiff filed a timely charge of discrimination based on national origin, sexual harassment and retaliation, against Defendant with the United States Equal Employment Opportunity Commission ("EEOC"), and received her Notice of Right to Sue within Ninety (90) days on Oct 16.

**FACTUAL****ALLEGATION**

PLAINTIFF joined Amazon in February 2015 as a temporary assignment during which. PLAINTIFF started as a temporary employee and then was hired as a fulltime permanent employee in July 2015. During Plaintiff assignment as a supply chain manager, Plaintiff was asked to work on stretch task to support another team, during which PLAINTIFF developed dashboard for the Security team, the security team were pleased of the PLAINTIFF work and the security manager Bill Bland offered PLAINTIFF Level 5 position as a business Analyst in March 2015, PLAINTIFF manager then Sam Davis told PLAINTIFF to stay with his team and he will match Mr. Bland's offer since PLAINTIFF is more interested in a project management role, later manager Sam Davis who was level 5 as well couldn't get approval to open job requisition with level 5 for PLAINTIFF but promised PLAINTIFF that he will promote her to level 5 in April 2016 during Amazon's annual review, so PLAINTIFF joined the team at level 4 on July 2015, Mr. Davis left the company in December of 2015 and PLAINTIFF started to report to Marc Darling who was also level 5. Marc Darling knew of the history of PLAINTIFF work and the level 5 offer with the security team. Plaintiff during her tenure as a supply chain program manager developed an optimized spare parts replenishment mechanism that provided over \$ 30 M in cost saving. While Plaintiff deserved promotion, manager then Marc Darling who was L5 level refused to promote Plaintiff for her accomplishment and in addition to the outstanding promise claiming that PLAINTIFF lacks the "Earn trust Amazon leadership principle" without furnishing evidence of the gap, and he disregarded that Plaintiff had established great business relationship with vendors and other cross functional team members, Emails



72 supporting this on page 98 – page after discussing this unfair treatment with Human  
73 Resources Department, HR advised that Plaintiff could explore joining another team;  
74 Plaintiff identified a role with the cloud innovation center program and went through  
75 the interview loop with five different people and after passing the interview loop,  
76 Plaintiff started with the current role as global program manager in April 2018.

77 PLAINTIFF ramped up fast on her new role and managed to cover for local program  
78 manager while carrying out her responsibility and was able to create program  
79 internal webpage and many of the program assets and files repositories and  
80 templates, the program scaled from one location to 8 active locations by November  
81 2018. PLAINTIFF had many accomplishments at the role and travelled to global  
82 locations to provide program support. PLAINTIFF was promoted in November 2018.  
83 PLAINTIFF was awarded stocks for her promotion that vests in November 2020,  
84 which PLAINTIFF lost because the stocks vest date falls after PLAINTIFF termination  
85 date of July 2020. PLAINTIFF.

86 In March 2020, PLAINTIFF was placed on Performance improvement plan (PIP)  
87 without history of underperformance by manager Mr. Ben Butler who advised that he  
88 received solicited and unsolicited feedback from few team members that warrant  
89 placing PLAINTIFF on PIP. The duration of the PIP was only for one month with five  
90 major tasks that PLAINTIFF was asked to complete in addition her huge workload of  
91 her regular duties. The assigned tasks in the PIP were not related to the team  
92 members feedback nor directly related to the PLAINTIFF major work. Mr. Butler  
93 didn't make any efforts to investigate the complaints from team members, and the  
94 PLAINTIFF asked manager and HR to investigate those claims so she can be aware

95 and resolve but this never happened. PLAINTIFF had to work 14 hours a day,  
96 including weekends, to complete the (PIP) work assignment. Subsequently PLAINTIFF  
97 completed the PIP tasks precisely as outlined in the PIP document, in timely manner  
98 and provided weekly status updates (please see [Appendix 1 Email 2](#)).

99 Manager Mr. Butler informed PLAINTIFF that she failed the PIP because Mr. Butler  
100 claimed PLAINTIFF failed to invite one key stakeholder to a document review meeting,  
101 even though the PLAINTIFF provided print screen of the meeting invite where that  
102 person was invited. Also claimed that PLAINTIFF's work product was unsatisfactory  
103 and full of grammatical errors only while he disregarded the accuracy of technical  
104 content and level of effort to compile it .and Mr. Butler cited feedback from two  
105 hostile team members who exhibited hostility toward PLAINTIFF that manager Mr.  
106 Butler was aware of. And on the Newsletter assignment where Mr. Butler used the  
107 draft version of the newsletter to provide his assessment where Mr. Butler blamed the  
108 PLAINTIFF for exceeding three pages when Mr. Butler never furnished page limit when  
109 he provided the PIP assignment guidelines, and it is worth noting that all previous  
110 newsletters exceeded three pages, with regard to content, only Mr. Butler has the

111 autonomy on what content to be removed as PLAINTIFF has no autonomy on that.  
112 Hence that the PLAINTIFF final version of the newsletter was three pages long and he  
113 produced it in PDF and OFT formats and professionally done.

114 HR advised that the PLAINTIFF can appeal the manager decision through the  
115 company's appeal process where a decision can be made by panel that is comprised  
116 of three AWS employees from outside the PLAINTIFF's team, during the appeal  
117 PLAINTIFF had ten minutes to defend her position, while PLAINTIFF provided  
118 evidences to negate the invalid reasons yet PLAINTIFF was failed regardless and  
119 terminated on the spot.

120 PLAINTIFF lost her job and was not able to transfer to another position within the  
121 company the minute she was placed on PIP and PLAINTIFF was on the no rehire list  
122 as a result of failing the PIP. HR did not help Plaintiff to objectively evaluate the PIP  
123 nor assisted PLAINTIFF throughout the process and offered PLAINTIFF \$ 3000 only  
124 as severance payment once PLAINTIFF signs the release agreement.

125 On July 2020 Plaintiff retained an attorney who charged Plaintiff \$ 8,600 and was  
126 able to negotiate \$ 20,000 severance if Plaintiff agrees to sign a settlement agreement.  
127 Plaintiff refused to sign the settlement agreement because it contained unacceptable  
128 conditions, which are harmful to her career and totally unfair. Plaintiff could not  
129 keep paying the attorney who refused to continue representing PLAINTIFF on the  
130 contingency basis; consequently, Plaintiff proceeded with the EEOC filing on her own  
131 and filed the charge on October 15, 2020 where PLAINTIFF received the right to sue  
132 letter.

133 1) **DISCRIMINATORY INTENT/ TREATMENT:**

134 PLAINTIFF was faced with hostility based on her accent and national origin from few  
135 team members, as a result PLAINTIFF experienced alienation, isolation, favoritism,  
136 lack or collaboration and exclusion from meetings and PLAINTIFF work was claimed  
137 by hostile team members. PLAINTIFF communicated favoritism to manager Mr.  
138 Butler who assured PLAINTIFF that her work even if claimed he knows that  
139 PLAINTIFF created it, Mr. Butler told PLAINTIFF since the program is growing Mr.  
140 Butler need PLAINTIFF to focus on handling new ambiguous project because Mr.  
141 Butler trusted PLAINTIFF capabilities. Mr. Butler promised PLAINTIFF with career  
142 growth after PLAINTIFF finish rolling out the new project which is 'Salesforce  
143 interface and dashboard for the program" Mr. Butler assured PLAINTIFF that her  
144 accomplishment will be awarded on the next annual evaluation in April 2020. Also,  
145 Mr. Butler addressed Ms. Berry and Ms. Whitespear hostility and acknowledged  
146 PLAINTIFF team work attitude when asked to cover for both of during their absence.  
147 Ms. Berry and her successor Ms. Whitespear who was hired as Cal Poly local project  
148 manager, both based in San Luis Obispo CA, started teaming out against PLAINTIFF,  
149 where they deliberately delayed input to critical monthly reporting which forced  
150 PLAINTIFF to work the weekends to incorporate their input into the monthly  
151 executives reporting to meet the deadline, they undermined PLAINTIFF work on  
152 invalid ground and claimed they didn't understand PLAINTIFF spoken English  
153 PLAINTIFF 's manager Mr. Butler addressed Ms. Berry and Ms. Whitespear hostility  
154 in June 2019 in a documented email ([Appendix 1 email 2](#)).



155 However, they continued their hostility toward PLAINTIFF and Mr. Butler was on back  
 156 to back business travel and he advised he will address those issues when he return.  
 157 PLAINTIFF filed ethics ticket and complained to the employee help line at Amazon but  
 158 no action was taken. Later when Mr. Butler returned from his business travel instead  
 159 of addressing those outstanding hostilities, he placed PLAINTIFF on (PIP) end of  
 160 March 2020.

161 **Hostile team members:**

- 162
- 163 • Renee Berry Global PM: joined Feb 2018, reports to Paul O'shaunsey
  - 164 • Jennifer Whitespear Cal Poly PM, joined Jan 2019, Renee's successor reports  
 165 to Paul O' O'shaunsey
  - 166 • Jason Bass, joined October 2018, supervisor reports to Ben Butler PLAINTIFF's  
 167 manager

168 PLAINTIFF was tasked to support a new subprogram called the Digital Innovation for  
 169 the public sector end of January 2020 which is comprised of four team members,  
 170 three of them exhibited hostility toward PLAINTIFF after asking me where I was from  
 171 with names below:

- 172 • Victoria Condon internal transfer and is Jason Bass 's recruit and joined in  
 173 December 2019, she reports to PLAINTIFF's manager Ben Butler
- 174 • Monica Carranza new hire in January 2020, she reports to PLAINTIFF's  
 175 manager Ben Butler.
- 176 • Noah Eden, internal transfer joined in Dec 2019 reports to PLAINTIFF's  
 177 manager Ben Butler.

178

**1) LANGUAGE DISCRIMINATION AND WORK BULLYING:**

PLAINTIFF faced plenty of malicious behavior from Ms. Berry since PLAINTIFF started on the program, in April 2018 Ms. Berry who started three months prior to PLAINTIFF, didn't collaborate with PLAINTIFF to provide information required for the monthly reporting for her Calpoly location which necessitate PLAINTIFF to travel to Calpoly in San Luis Obispo to compile the information and do set up the tracking mechanism herself working with Cal Poly senior staff members, PLAINTIFF then asked Ms. Berry update PLAINTIFF on monthly basis with that information but Ms. Berry refused to collaborate with PLAINTIFF for example:

1-.Ms.Berry will request to reschedule meetings initialized by PLAINTIFF couple of times before she finally attend even though PLAINTIFF accommodates Ms.Berry time zone and schedule the meetings per Ms. Berry's request 7PM EST for only 30 minutes, yet Ms. Berry if attending, makes several restroom interruptions during the 30 minutes meeting which were never productive.

2-Ms. Berry Ms. Berry claims PLAINTIFF work after Ms. Berry comes back from her seven months paid leave (Internal program webpage and other completed tasks).

3-Ms.Berry create noise to discredit PLAINTIFF.

4-Ms. Berry removed PLAINTIFF access to the project management plan PLAINTIFF originally created for Calpol.

4-Ms. Berry introduced external software tool called "Airtable" PLAINTIFF advised to file ticket with the information security team to ensure it is allowed, PLAINTIFF opened a ticket and copied Ms. Berry and as a result the info security team advised that the tool wasn't approved yet Ms. Berry continued paying annual subscription to



202 this tool on three different account by the company's credit card and Ms. Berry never  
203 provided PLAINTIFF access to this tool nor sent PLAINTIF the required information  
204 for the monthly reporting.

205 5- Ms. Berry exercised nepotism where she was able to hire solution architect for L6  
206 position without having satisfied the minimum level requirement bachelor's degree  
207 while I referred ten highly qualified applicant who met the hiring requirement but  
208 none of them were hired.

209 **SEXUAL HARASSMENT RETALITION:**

210 PLAINTIFF was facing retaliation from MR. Jason Bass for rebuffing his sexual  
211 interest and advances during a business trip. Mr. Bass and PLAINTIFF had developed  
212 a strong friendship at work since Mr. Bass joined the team in October 2018. Mr. Bass  
213 would ask PLAINTIFF to join him for lunch and dinner as well as happy hours when  
214 he visited Virginia because he is based in Michigan. Mr. Bass was very kind to  
215 PLAINTIFF and expressed sympathy that PLAINTIFF had to work long hours covering  
216 for Ms. Berry during her long absence and wondered why Mr. Butler does not hire a  
217 replacement. Mr. Bass was supportive of PLAINTIFF and told PLAINTIFF to be his  
218 program manager for his initiatives and accompany him on this business travel.

219 During the day of incident at the hotel on February 14, 2019, Mr. Bass Joined  
220 PLAINTIFF at dinner and went to PLAINTIFF's room where both MR. Bass and  
221 PLAINTIFF shared bottle of wine while chatting as MR. Bass shared with PLAINTIFF  
222 that he was going through a divorce, then Mr. Bass expressed his interest in  
223 PLAINTIFF after complimenting her looks and that he been always attracted to her.  
224 PLAINTIFF told Mr. Bass that she also values his friendship, and it is appropriate to

225 keep the interaction between them professional so it doesn't impact their work  
226 negatively. Mr. Bass then inquired from PLAINTIFF why she allowed him into her  
227 room, PLAINTIFF said because she trusted Mr. Bass and he is very dear friend and  
228 coworker. PLAINTIFF noticed Mr. Bass face became pale and he was upset,  
229 PLAINTIFF then tried to calm Mr. Bass and told him not to be upset as she sincerely  
230 values him, and it is better to continue their relations in professional setting.  
231 However, since then PLAINTIFF noticed bitterness from Mr. Bass although PLAINTIFF  
232 continued her friendly demeanor with MR. Bass hoping that he understands. Mr.  
233 Bass changed attitude towards PLAINTIFF, and started criticizing PLAINTIFF work  
234 negatively and his comments on her PIP were based on incorrect facts while using  
235 degrading language. Plaintiff felt his retaliation when his biased feedback contributed  
236 to failing in her PIP. PLAINTIFF had actually sent Mr. Bass an email message  
237 explaining to him the different documents and context of each (this email can be  
238 found in [Appendix 7](#)), yet HR still considered Mr. Bass comments as valid.

239  
240 When Plaintiff reported to the [VP of HR in May](#) 19 who assigned Ms. Watson to  
241 investigate, Ms. Watson concluded that PLAINTIFF's claims were invalid since Mr.  
242 Bass comment agreed with other team members feedback regarding her work,  
243 although PLAINTIFF explained to Ms. Watson that those few team members were Ms.  
244 Berry and Ms. Whitespear who always exhibited hostility towards PLAINTIFF, and the  
245 other two team members who were internal recruits by Mr. Bass. Ms. Condrón, Ms.  
246 Carranza and Mr. Eden who complained to PLAINTIFF's manager that PLAINTIFF  
247 lacked the Amazon leadership principle "Earn trust" after only two weeks of  
248 PLAINTIFF was assigned to support their new program end of January 2020 and

249 without them citing where PLAINTIFF exhibited gap in “Earn Trust” , hence  
250 PLAINTIFF hasn’t failed in providing the necessary support to the team in project  
251 management and marketing and branding support and was able to create lots of  
252 asset for the program and provided marketing, those unsubstantiated claims and  
253 unexplained hostility from those three team members contributed to placing  
254 PLAINTIFF on PIP.

255 **Wrongful Termination**

256 PLAINTIFF could not understand why she was treated differently and faced with  
257 tremendous amount of hostility from few team members, favoritism, in addition to  
258 being placed on PIP when her manager Mr. Ben Butler was always supportive and  
259 complemented PLAINTIFF’s work and promised her career growth, and promotion for  
260 her accomplishments, and teamwork attitude and dedication.

261 Mr. Butler, during a business trip with Ms. Maksosa, complemented her work and  
262 gave Plaintiff a red rose at the end of team activities in June 2019 expressing his  
263 gratitude for her work. Mr. Butler told Plaintiff that she has growth potential and that  
264 he is planning to increase her responsibilities to manage a new program that will be  
265 created in January 2020. Plaintiff thanked Mr. Butler for his confidence in her  
266 abilities. Mr. Butler also told PLAINTIFF to have thick skin regarding the hostilities  
267 that ware exhibited from the two team members Renee Berry and Jennifer  
268 Whitespear and said that this he sees that a lot on every level at Amazon.

269 End of March 2020, PLAINTIFF sent Mr. Butler list of accomplishment prior to her  
270 meeting with him. PLAINTIFF was shocked when Mr. Butler told PLAINTIFF that she  
271 is being placed on PIP when there were no history of underperformance and all cited

few team members statements on the PIP were from hostile team members who had prejudice biased against PLAINTIFF.

**Summary**

PLAINTIFF hereby incorporates the allegation in section 1) through 4) expressing she has been harassed and retaliated against. PLAINTIFF has been bullied at work and was subjected to hostile work environment and favoritism that was never addressed by HR. Plaintiff reported hostility to the affinity group at Amazon, also to HR who claimed they investigated but never addressed the issues.

Not only PLAINTIFF did not underperform, PLAINTIFF wasn't provided with performance benchmarks nor was given performance report reviews to show her performance gaps. In fact, PLAINTIFF was always assigned projects where she was given no guidance because manager Mr. Butler trusted Plaintiff abilities. Also, while PIP is rigged based on time frame, assessment and expectation, HR approved the PIP despite the unrealistic timeframe of one month with the five huge tasks assigned that were unrelated to issues cited in the PIP of solicited and unsolicited feedbacks nor PLAINTIFF core responsibilities.

**PRAYER FOR RELIEF:**

WHEREFORE, PLAINTIFF request that the court award her a compensatory damage in an amount to be proven at trial to compensate for wages loss and back pay, and front pay loss, in addition to her earned stocks as result of her promotion considering PLAINTIFF never received a severance for being laid off during the Pandemic. Also amend the release agreement that the PLAINTIFF refused to sign to remove during clause number 11 in the release so that it will not impact PLAINTIFF future

employment and career growth since the Plaintiff hasn't committed anything wrong that warrant that harsh restriction.

PLAINTIFF also respectfully request that she gets punitive damages for the emotional pain and suffering during this time when PLAINTIFF was placed on PIP while her handicapped mother was having a medical procedure at the hospital with critical condition that was ongoing for a year, and PLAINTIFF had to work despite her broken thumb injury she had at work in August 2019, as PLAINTIFF has been out of work and have been using her retirement funds to sustain her living while actively pursuing employment.

PLAINTIFF also request to be reimbursed for the attorney fees PLAINTIFF paid \$8600 as well as court fees.

**McDonnell-Douglas Test,**

PLAINTIFF had a journalized timeline with incident of hostile comments from team members included in this document.

PLAINTIFF would answer YES to the questions per below:

- **Question: Were you treated differently someone with the same experience, qualifications, and/or education, who is not in your protected class?**

- Answer: PLAINTIFF was treated differently as to workload assigned; Plaintiff work was claimed by coworkers, training during work hours were allowed to other employees and not the PLAINTIFF.



- 316      ○ PLAINTIFF was alienated and excluded from many activities and subject to  
317      malicious activities by hostile team members named outlined above.
- 318      ○ Example: Plaintiff was global program manager in April 2018, Ms. Berry who  
319      was local Cal Poly program manager started on Feb 2018, never did any work  
320      and was out on a paid leave for 7 months June 2018- Jan 15 2019, Ms. Berry  
321      was promoted after coming back to be the global program manager similar role  
322      to the Plaintiff without performing any work, and Plaintiff had to do Ms. Berry  
323      work even prior of Ms. Berry going on leave, also Plaintiff was asked to  
324      continue covering for Ms. Berry after she came back for additional five months  
325      so Ms. Berry can focus on completing her cloud practitioner certification which  
326      is requirement for any new team member join the team in their first 90 days  
327      from hire date.
- 328      ○ Ms. Berry was able to use hire friend of her issuing a purchase order without  
329      following the procurement process and having statement of work for service  
330      purchase order for \$20,000 to create the program newsletter which is a task  
331      performed by both PLAINTIFF and Ms. Berry alternating on quarterly basis,  
332      PLAINTIFF was not allowed to use external resource nor tap to the hired person  
333      and PLAINTIFF was required to create the newsletter herself.
- 334      ○ **Question: Did managers or supervisors regularly make rude or derogatory**  
335      **comments directed at your status as a member of a protected class or at**  
336      **all members of your class and related to work? For example, "Women**  
337      **don't belong on a construction site" or "Older employees are set in their**  
338      **ways and make terrible managers."**



- 339      ○ A: I was told I lack the “Earn Trust” because of my national origins, at both  
340      team I worked at, my previous team I was deprived from promotion after I  
341      developed optimized predictive replenishment sparing process that resulted in  
342      \$ 30 M cost saving when I went to HR, they advised that I could explore  
343      another role in the company, hence that manager took credit from my work  
344      and got himself promoted.
- 345      ○ At my current role, Ms. Condrón, Ms. Carranza. Mr. Eden who joined the team  
346      Between Nov 2019 and Jan 2020 and I was tasked to support their  
347      subprogram end of Jan 2020, told my manager Mr. Butler that I lack the “Earn  
348      Trust” without establishing a reason, they disregarded all Plaintiff’s  
349      contribution in two weeks establishing their program from ground up  
350      operational tasks. those three team members exhibited hostility towards  
351      Plaintiff translated in declining to share their calendar, declining meetings and  
352      rescheduling meetings with Plaintiff. They complained to PLAINTIFF’s manager  
353      after only two interaction with them in only two weeks. Their complaint  
354      contributed to manager placing PLAINTIFF on (PIP). The Earn Trust is an  
355      Amazon leadership principle that stipulates that the employee is able to build  
356      strong business relationship with internal and external business partners,  
357      while Plaintiff has strong record building relationship with many vendors and  
358      internal and external business partners that helped program scaling and  
359      helped in growing business, Plaintiff was told lack the Earn trust without valid  
360      reason that resulting in denying to fund Plaintiff security clearance to work on

government related initiative, and blocking Plaintiff from deserved promotion and contributed to the wrongful termination.

- Hostile coworkers, Ms. Berry and Ms. Whitespear continued complaining about Plaintiff's spoken English and only those two were unable to understand Plaintiff spoken English. Both of them exhibited hostility translated in adding hurdles to Plaintiff tasks that resulted in delaying Plaintiff's project deadlines and required Plaintiff to do extra work and do their work to ensure Plaintiff project meet the deadline. Ms. Berry and Ms. Whitespear delayed giving Plaintiff access to the "Airtable" web-base spreadsheet where they store Cal Poly activities for a year and few months and Plaintiff got the read only access end of March 2020.

**Question: Are the circumstances of your treatment so unusual, shocking, unjust, or severe as to suggest discrimination?**

○ Answer:

- Plaintiff was placed on performance improvement plan without any history of underperformance, length of the (PIP) is only one month with five big deliverables mostly marketing tasks which are not primary responsibilities of the Plaintiff, whereas Plaintiff completed all the requested five tasks in a timely and quality manner, Plaintiff was subjectively failed on invalid reason and terminated without given chance to transfer to another team, Plaintiff was terminated with no rehire option during the Pandemic.
- After Plaintiff completed the performance improvement plan (PIP) as per the (PIP) guidelines and provided weekly status reports. Note that Plaintiff had to

384 work fourteen hours a day, including the weekend to complete the work.  
385 Plaintiff was notified that she failed the PIP based on subjective reasons that  
386 were invalid. Plaintiff disagreed and provided evidence to justify their invalidity,  
387 but decision was not reversed, and Human Resources proposed filing an  
388 appeal. The appeal was scheduled for June 29, 2020, as Plaintiff asked to  
389 reschedule due to Plaintiff's mother hospital procedure and hospital stay.

- 390 o Plaintiff had to prepare the appeal document per HR directive and was  
391 constrained with how to reflect the (PIP) work products and documents on  
392 three pages one face only which will not allow the panel to have objective way  
393 to measure the quality of the work, also the panel are three amazon employees  
394 whom the Plaintiff never worked or interacted with before. Plaintiff wasn't  
395 allowed to attach the nor provide links for the (PIP) finished documents nor  
396 communicate with the panel prior to the appeal. Plaintiff was asked to fit all  
397 the documents produced on three pages one side on the appendix section of  
398 the appeal document. Plaintiff then submitted the appeal document to HR who  
399 compiled along with the additional feedback from the manager Mr. Butler.  
400 Plaintiff won't see the updated manager's feedback to the appeal document till  
401 24 hours prior to the day of the appeal date, HR sends the appeal document to  
402 both manager and Plaintiff to prepare for the appeal and the Plaintiff is not  
403 allowed to respond to the new updated comments from the manger on the  
404 document. The Plaintiff is given ten minutes only during the appeal which is 25  
405 minutes long to verbally address the updated manager's feedback comments in  
406 front of the appeal panel and talk about the PIP deliverables, the rest of the

time is for answering the panel's questions. Plaintiff explained to the panel that the ground of failing is invalid; however, the panel failed the Plaintiff regardless and looked like the decision was predetermined to fail Plaintiff regardless that facts Plaintiff provided below:

- Expectation 2: manager kept changing expectation from what was provided in the PIP initially while document was to create user step by step guide to the cloud innovation centers (CIC) program managers and the Digital innovation leads, he asked to add the account managers as well. Also blamed Plaintiff for not inviting key stakeholder Jennifer Whitespear to the final document review meeting outlined in the PIP was incorrect and Plaintiff provided evidence that Jennifer Whitespear was included per the screen shot on Item 2 on appendix in the appeal document. Jennifer was also shared the document via email sent to all stakeholders a month prior with link to the shared folder as well, and print screen for that email was also provided in the appeal. note that this was final review for the document meeting and the Plaintiff had weekly review meetings as well and Jennifer Whitespear was also invited, noting that Jennifer was on paid time off of the week of the final review meeting as well as the week before and after the final review meeting. Yet the Plaintiff was blamed and failed unfairly.
- Feedback from Renee Berry is incorrect because the Salesforce project wasn't yet completed as the development rolled out in two phases with phase two completed in June 2020 Renee as well as Mr. Butler and the whole team knows

429 that, and it was communicated several times as well as documented in the  
430 project plan (exhibit -3)

- 431 • Mr. Bass feedback was incorrect because he was saying the document that  
432 Plaintiff was working on since August is far from finished is inaccurate as  
433 Plaintiff created four different documents for Salesforce, each for different  
434 objective and context, Plaintiff communicated to Mr. Bass via email to explain  
435 the different document (exhibit- 3), yet this invalid feedback still counted for  
436 failing Plaintiff on this task which is totally unfair.

- 437 • Expectation 3: Plaintiff's manager had typo in his response, yet Plaintiff was  
438 blamed for grammatical errors on draft documents not the final document with  
439 is totally unfair. Embark tool which stands for AWS new employees training  
440 plans that Plaintiff created. The training plans have built-in resources and  
441 training links along with date of completion, when a plan is assigned to an  
442 employee it preserves the link that was in the plan the date of the assignment  
443 so if the training link expires later after the plan is assigned to an employee the  
444 Plaintiff has no ability to view that link it or fix it, and Plaintiff shouldn't be  
445 blamed for that, Plaintiff usually conduct quality check periodically and update  
446 any new training links and resources so my manager nor the panel were  
447 correct to fail me. Not to mention that managing those plans is very tedious  
448 and time-consuming efforts which add to the huge work load the Plaintiff has  
449 compared to the other program managers on the team.

- 450 • Plaintiff was blamed for the Responsible, Accountable, Consulted, Informed  
451 (RACI) 1chart where Plaintiff was asked to design three RACI charts for each of  
452 the subprograms as well as for the global project managers, this tasks was only  
453 assigned to Plaintiff and none of the program managers were tasked with this  
454 or expected to complete even though it is basic responsibility for any program  
455 manager, Plaintiff completed that for the global Program Manager a year ago  
456 and was asked to update it for the second time in the (PIP), while she updated  
457 the roles and respective tasks with what Plaintiff knows in general for the other  
458 subprograms and did her best, Plaintiff also asked the team to add any task  
459 they handle, few team members were able to update, and many others were  
460 fine with the Plaintiff input and have nothing else to update because they were  
461 new and not fully ramped up on their roles yet and the new team members  
462 indicated that they are still new and don't have clear insight yet on their  
463 responsibilities which is why they can't contribute with, additional input. So,  
464 Plaintiff did her part on this task and the reason of failing her on this task was  
465 invalid as well.
- 466 ○ Plaintiff was blamed on Newsletter where she was assigned external facing  
467 Newsletter for the first time on her (PIP) as all previous newsletter were internal  
468 not external and this was the first time it was decided to created external facing  
469 newsletter, and it was assigned a task on PLAINTIFF PIP without providing  
470 guidance on how to handle this with the public relation team as usually any  
471 external facing communication should be approved by the public relation team

---

1 RACI chart is project management table to outline team role and which list tasks and who is Responsible, Accountable, Consulted and informed on each task.



before it is shared externally, and when Plaintiff had to do her own due diligence checking with senior management Richard Halket who advised that she should reach out to the public relation team which is the process for any external communication, Plaintiff was blamed for making due diligence effort to ensure proper channel approved the external facing content. Need to add that Plaintiff first created the first template of the internal newsletter in Jan 2019, and PLAINTIFF while alternating with Ms. Berry the quarterly task, PLAINTIFF created four Newsletter compared to only two created by Ms. Berry. hence that Ms. Berry was allowed to hire external person named Carol Hanko to create the newsletter when it is her turn.

o PLAINTIFF when was tasked to support the digital innovation team end of January 2020, three team members Ms. Condrón, Ms. Carranza and Mr. Eden unjustly complained to manger that PLAINTIFF lacks "Earn Trust" on invalid grounds and without providing evidence of where they have identified the gap, the new team members complains to the Plaintiff manager was incorrect and unjust and very premature and they disregarded all the work that PLAINTIFF carried out during those two weeks building all assets for this new program, in addition to Plaintiff's efforts to build relations with internal and external busines partners.

o **Question: Does your employer have a history of showing bias toward persons in your protected class?**

o Answer: pulling hiring records, the employers has biased against employees from middle eastern background, I was brought in not direct hire but temp to

hire, to see middle eastern origin person been directly hired at Amazon is very rare, while I do not have records to Amazon recruiting archived files, but I am sure if we pulled those up, the trend can be noticed clearly. I witnessed couple cases where qualified people with accents were placed on the no hire list as a result of their interview when I was on the interview loop.

○ **Question: Are there noticeably few employees of your protected class at your workplace?**

○ **Answer:** Yes, most team members in my team are white American of third of fourth generation of Western European origins.

○ **Question: Have you noticed that other employees of your protected class seem to be singled out for adverse treatment or are put in lower ranking positions?**

○ **Answer:** Yes, there are very few of people with same protected class hired, but if they are, they usually are not given a high-ranking position that suits their credentials.

○ **Question: Have you heard other employees in your protected class complain about discrimination, particularly by the supervisor or manager who took the adverse action against you?**

○ **Answer:** in PLAINTIFF direct team there is no one in her protective class reports to Plaintiff manager Mr. Butler but the PLAINTIFF.

○ **Question: Are there statistics that show favoritism towards or bias against any group?**

517      ○ **Answer:** I am sure there are, but I have no access to those records. For me HR  
 518      never helped me in my promotion when I was on the first team nor at my  
 519      current role with the rigged PIP, hostility or favoritism that I experienced.

520      ○ **Question: Did your employer violate well-established company policy in**  
 521      **the way it treated you?**

522      ○ **Answer:** Yes, the company's policy is against bullying and hostile work  
 523      environment, and sexual harassment retaliation.

524      ○ **Question: Did your employer retain less qualified, non-protected**  
 525      **employees in the same job?**

526      ○ **Answer:** Yes, for the program manager role, none of the current program  
 527      manager ever had program management professional certification, nor had  
 528      good experience in project management, most of the new hire had 2 years or no  
 529      experience in project management and hired to be trained.

530      ○ In addition, Plaintiff had the highest number of badges compared to Ms. Berry  
 531      considering both started around the same time, badges are obtained upon  
 532      employee completion for certain training, considering PLAINTIFF completed her  
 533      studying for those courses during the weekends only. Plaintiff earned badges  
 534      as a result of obtaining passing scores, those badges are visible on Plaintiff  
 535      employee profile and can be viewed in Appendix 6.

537      UNITED STATES DISTRICT COURT, EASTERN DISTRICT OF VIRGINIA

1

538      APPENDICES

2

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554	<u>EMAIL CHAIN HAD TO COPY ROB CAREY MARCH OUR VP REPORTING PERSON</u>	
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561 **Appendices**

562  
563

564 **Appendix 1 Email Mr. Butler addressed hostility with Renee and Jennifer in**  
565 **July 2019, email below**



566  
 567 **From:** Maksosa, Lama  
 568 **Sent:** Friday, July 12, 2019 8:56 AM  
 569 **To:** Butler, Ben <[@amazon.com](mailto:@amazon.com)>  
 570 **Subject:** RE: concerns hopefully will close out

571  
 572 Hi Ben,

573  
 574 Sorry for the delay I wanted to send that yesterday at night but didn't chance to  
 575 finish it up as it is draining really...

576 Thanks for setting time tomorrow to with Renee and Jennifer points to discuss so we  
 577 can stop undermining me and stop the pettiness going on behind the back that will  
 578 impact my work, I don't care what they talk behind my back as long as it doesn't  
 579 affect my work or undermine me at work.

580  
 581 Trends with Jennifer:

582  
 583 Since Jennifer started I was support for all her onboarding needs as any new hire, in  
 584 addition have been accommodating and team player working around lots of missed  
 585 deadline she had (cic report, 2x2) also accepted to cover for Jennifer handling the  
 586 credit request for Calpoly after I trained her and handed off to her in March, upon  
 587 her request that she needed to study for her CPC I continued covering for her even  
 588 though I have a lot I am working on, I also had three additional shadowing session  
 589 with her so she can see from start to finish the process, items below been trending  
 590 and I am getting unfriendly hostile attitude from her:

591 1. CIC summit, while I was working on the CIC event report and sent email  
 592 to the team asking them to add to my report so we can send to Paul to send out  
 593 by the deadline, and Paul usually copy you, me Peter on the CIC summit  
 594 correspondence since we were the coordinators on the summit and POCs, at  
 595 that time Jennifer was out and came late after the deadline we gave the team to  
 596 provide feedback, she pinged me wanted to have her input in, so I asked you  
 597 and you said ok, she provided her input then gave the report we finalized to  
 598 Paul to send out to the attendee and excluded me, I mentioned that to you and  
 599 you said you talked to her, but that made me look bad in front of the outside  
 600 attendees, to see my name was deleted and Jennifer name was added, I  
 601 worked on the CIC summit and was on all correspondence so cutting me off  
 602 wasn't nice.

603 2. During the report meeting Jennifer kept saying the meeting wasting her  
 604 time and she identified gaps in the process, I asked her during the meeting to  
 605 cite those gaps, she said she had them somewhere, so she asked for action  
 606 items for the meeting, I said this fair request and sent out reply with action  
 607 items as well as I asked her about the gaps she said she identified, she then  
 608 came back and said no gaps, so why she was defaming me and undermining  
 609 me? (You have that email, so I didn't attach it here)

610 3. Why when we suppose to collaborate, I have to explain my self,  
 611 (attached second email), we wasted time back and forth because she didn't



want to copy me on credit team email, why she has to only talk to me like this while in the PM meeting she uses very low voice with Renee, I don't care if they team together, but why teaming against me? I understand that Renee projects that she has higher up and speaks like she is president of many companies and she has lots of higher up connection that Jennifer would want to kiss up to but shouldn't be on my expense.

Issues with Renee: I like to know why she is doing this and how we can get to the bottom of it and establish respectful collaborative teamwork environment.

Since Renee was at Calpoly getting information regarding challenges was like extracting wisdom tooth, she kept want to experiment with Airtable and asana and we couldn't get list of challenges until I had to build in the interim tracker so I can feed the info for the DI 2x2 tracker monthly reporting.

1. I tried to help her on Airtable and submitted ticket to IT security when they came back and said we can use Asana or playbook, so I asked she can use asana yet no challenge list was provided.
2. She received credit report from Amie (the report that had missing info) she never submitted any credit request, then Peter asked me to cover on that and do my discoveries to figure out the process to submit Calpoly credit which has her responsibility.
3. Every time I try to schedule meeting with her to get status update, she will change the time and I accommodate her time to 7PM my time, yet she will either be at a hotel when many interruption, or she had to visit the rest room many times so those meeting weren't ever productive.
4. When I visited Calpoly and arrange meeting in person with her at SPB10, she showed up, had argument with Nick then cancelled on me.
5. I realize she had issue working with Calpoly team why I was the one she lashes at?
6. Also when I build the wiki back in May, she said that was her job, you suppose to build the calpoly wiki and website as it been launched 6 month now, but those were never built.
7. She came back during the CIC summit, she didn't offer to help which I understand she wasn't supposed to, onetime Doris who was taking care of Breakfast catering forgot to get water bottles so I decided to go get water and I asked around anyone who had cars since everyone was out of town, so I asked her if we can do that, she was very upset and told me what else you are missing did u do proper planning for this? Which was very demeaning, I went with her around the block and got box of water bottles but I said to myself definitely next time I will get an uber or asks someone else for sure, but I was expecting team collaboration.
8. Since she came back, she tries to undermine me, first the group calendar thing, then claimed that I set up too many meeting, weekly and monthly, she changed that and reinstate same meeting frequency with different name, not sure why?



657 9. We established Raci and I thought we can be collaborative on global  
658 items and handle individually our respective Cic we support, she does behind  
659 the back the wiki plan and I was the last to know, then wisdom, what I get is  
660 she is wiping my work and tries to get her work to be visible, she communicate  
661 with me copying you only and rarely respond to IM and if so maybe next day or  
662 in few days later to an email.

663 10. She keeps purposely excluding me from team agenda if was to provide  
664 items review.  
665

666 Thanks,  
667 Lama  
668

669 From: Butler, Ben  
670 Sent: Monday, July 8, 2019 4:00 PM  
671 To: Maksosa, Lama  
672 Subject: Notes on our 1:1 discussions today  
673

674 Lama,

675 Thank you for your 1:1 time today and I think we went through a lot of issues and  
676 hopefully we addressed them  
677 all.

678 Topics we discussed:

679 1) Please escalate any time you feel you are being disrespected or bullied by anyone  
680 on the team.

681 2) Please let me know if you do not get a timely response, 2 business days, on a  
682 request for information or update that you are doing for the program.

683 3) Regarding the CIC meeting for the CIC Credit Utilization report:

684 a. It seems in general, the meeting did not go well from anyone's perspective, let's try  
685 to use the Amazonian doc review process to do future meetings such as these.

686 b. I will speak with Peter about setting expectations and background

687 c. Escalate to me if you feel there is a meeting that should not happen and let me  
688 know why

689 d. Please feel free to let me know ASAP if you feel you are being disrespected or  
690 thrown under the bus and let me know, even if I am on vacation, just Chime me.

691 e. Be cognizant of getting emotional and defensive in a meeting, people tend to  
692 remember that

693 versus the points you are trying to make, even if you are correct. Try to keep cool and  
694 escalate to me.

695 f. I am glad we had a chance to conference Jennifer in and get you the opportunity to  
696 express your point of view.

697 g. I am less concerned about your thought process nor that you didn't think through  
698 the report, what I am most concerned about is how you can learn from this  
699 experience and how you would handle this situation in the future.  
700  
701

4) Overall, I know you are working hard but please don't take people being critical of work as a personal attack or that you have to defend yourself. I know it is difficult, but no one has told me it is not because you are not prepared or working hard. If you feel the audience does not have the background, cancel the meeting or remove yourself from it or pull me in.

a. We have had several discussions at Forte, with the Amie discussion in Feb regarding credits, with our discussions regarding Renee, and not this Credits meeting with you feeling disrespected.

b. I truly don't think everyone is trying to do that but I am very sorry you are feeling that way.

5) You have requested that if anyone in the future makes a comment that I let you know. I will be sure to do ask for the data points they are referring to, such as Renee saying she is

6) Please be careful about what you share to customers, such as stating you didn't know about the service owner tool or showing screenshots of internal tools with a customer on the email thread. Also, work Through Jennifer on any Cal Poly credit issues.

7) Renee will own the wiki and wisdom, I am trying to give you large pieces of responsibility for you to own, such as the CIC Credits Process, the CIC Salesforce process, and the CONOPS program management, in addition to EMEA PM, if you focus on getting these to be bar raising and not worry about what you have or don't have in terms of responsibility.

2 I acknowledge that I misinformed the team that you were doing Wisdom, in fact Renee will do both and you will work on the other above-mentioned items.

a. Please let me know if you would like me to support you in a call with Renee, like what we did with Jennifer.

You have a lot to offer the program and I look forward to the results you will bring. I am trying to give you the bandwidth and responsibility to get these done.

Thank you, Lama!

Ben Butler  
Global Lead, AWS Cloud Innovation Centers

Credit meeting email below:

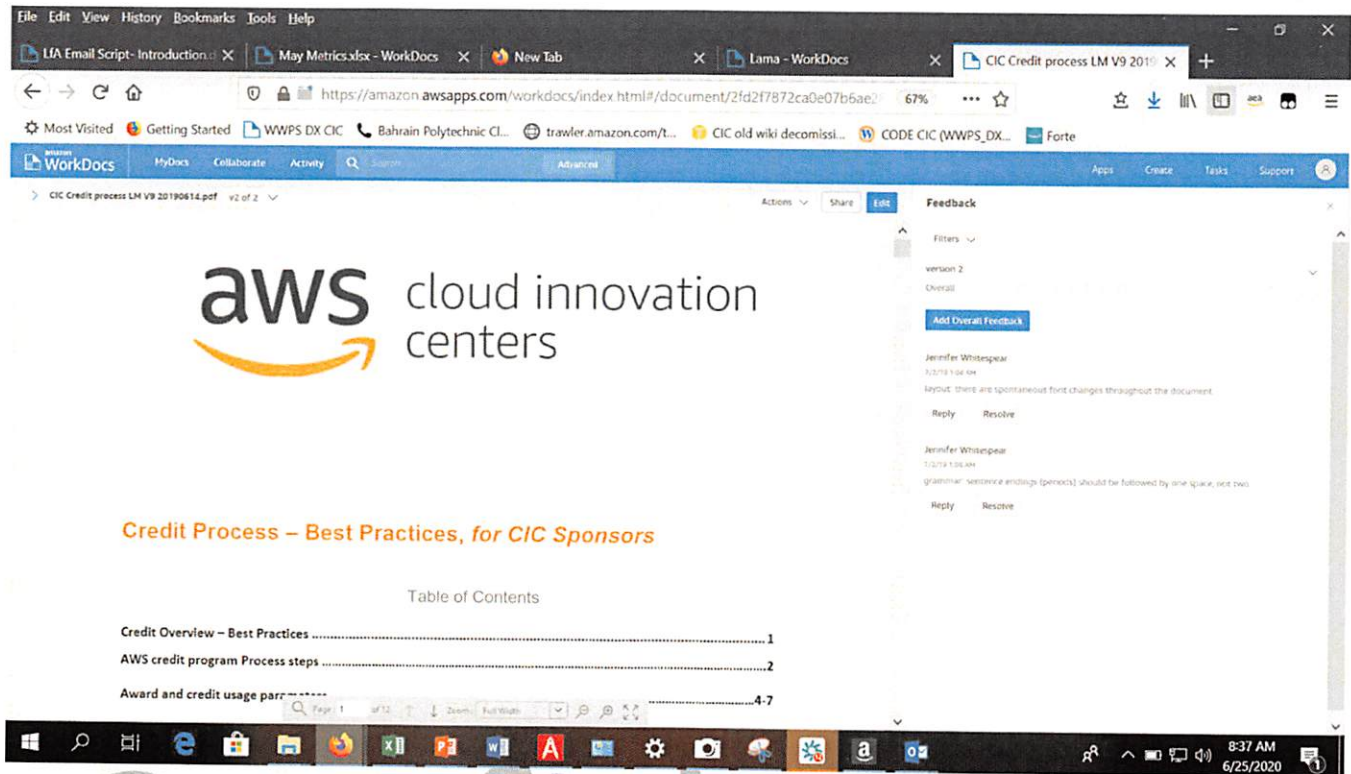
748  
749 **From:** Maksosa, Lama  
750 **Sent:** Tuesday, July 2, 2019 9:39 AM  
751 **To:** Whitespear, Jennifer <[@amazon.com](mailto:@amazon.com)>  
752 **Cc:** Gallagher, Peter <[@amazon.com](mailto:@amazon.com)>; DeSorda, Mike <[@amazon.com](mailto:@amazon.com)>; Bass, Jason  
753 <[@amazon.com](mailto:@amazon.com)>; Sheeran, Jude <[@amazon.com](mailto:@amazon.com)>; Butler, Ben <[@amazon.com](mailto:@amazon.com)>; Berry,  
754 Renee <[@amazon.com](mailto:@amazon.com)>  
755 **Subject:** RE: Credit utilization report  
756

757 Ok, thank you Jennifer, I will create formal PM SOP document once I finalize the CIC sponsor  
758 one.  
759 Best,  
760 Lama  
761

762 **From:** Whitespear, Jennifer <[@amazon.com](mailto:@amazon.com)>  
763 **Sent:** Tuesday, July 2, 2019 1:12 AM  
764 **To:** Maksosa, Lama <[@amazon.com](mailto:@amazon.com)>; Gallagher, Peter <[@amazon.com](mailto:@amazon.com)>; DeSorda, Mike  
765 <[@amazon.com](mailto:@amazon.com)>; Bass, Jason <[@amazon.com](mailto:@amazon.com)>; Sheeran, Jude <[@amazon.com](mailto:@amazon.com)>; Butler,  
766 Ben <[@amazon.com](mailto:@amazon.com)>; Berry, Renee <[@amazon.com](mailto:@amazon.com)>  
767 **Subject:** RE: Credit utilization report  
768

769 Hi Lama,  
770 I've added my feedback to the CIC credit process here:  
771 <https://amazon.awsapps.com/workdocs/index.html#/document/2fd2f7872ca0e07b6ae28a77e3ec97decd8b0970e9c426494006f963d7d63f08>  
772  
773 The process gap I had identified was that there were no SOPs written for the PMs on how to  
774 handle credits – but you have written that since my statement, so no longer a gap.  
775





Thanks,  
**Jennifer Whitespear**  
 Project Manager, Cloud Innovation Center

**From:** Maksosa, Lama <[@amazon.com](mailto:@amazon.com)>  
**Sent:** Thursday, June 27, 2019 2:07 PM  
**To:** Whitespear, Jennifer <[@amazon.com](mailto:@amazon.com)>; Gallagher, Peter <[@amazon.com](mailto:@amazon.com)>; DeSorda, Mike <[desorda@amazon.com](mailto:desorda@amazon.com)>; Bass, Jason <[@amazon.com](mailto:@amazon.com)>; Sheeran, Jude <[@amazon.com](mailto:@amazon.com)>; Butler, Ben <[@amazon.com](mailto:@amazon.com)>; Berry, Renee <[@amazon.com](mailto:@amazon.com)>  
**Subject:** RE: Credit utilization report

Hi Jennifer,  
 Please see clarification to my request below ( in green ) as only two of the four listed are for you to act on since you are onsite and are able to communicate directly now with the credits recipients.

Thanks,  
 Lama

**From:** Whitespear, Jennifer <[@amazon.com](mailto:@amazon.com)>  
**Sent:** Thursday, June 27, 2019 4:43 PM  
**To:** Maksosa, Lama <[@amazon.com](mailto:@amazon.com)>; Gallagher, Peter <[@amazon.com](mailto:@amazon.com)>; DeSorda, Mike <[@amazon.com](mailto:@amazon.com)>; Bass, Jason <[@amazon.com](mailto:@amazon.com)>; Sheeran, Jude <[@amazon.com](mailto:@amazon.com)>; Butler, Ben <[@amazon.com](mailto:@amazon.com)>; Berry, Renee <[@amazon.com](mailto:@amazon.com)>  
**Subject:** RE: Credit utilization report



Hi Lama,

I just want to ensure that I'm capturing your request to me accurately:

- Initiate and document the process for CIC challenge credit utilization (**Lama is handling**)
- Research and update missing information on the historical Cal Poly 'all in' and CSU credit tracking report (**Jennifer to handle since she is onsite ( this credit request tracker is separate report from the credit utilization report), request to map the 6 published challenges to credit requests tracker , and for the 7 currently in prototype, as for the other missing information related to the credit recipient POC , this is not urgent but when possible since you can now reach out to them directly which I wasn't able to as I wasn't provided their POC info), you just maintain the report and update it for new credit code requests so it is current and maps to the published challenges and challenges in porotypes .**
- Document the process for initiating, communicating and tracking credits (the act of actually requesting/granting credits) (**Lama is handling the CIC Sponsor credit process document from the point the CIC sponsor initiate the request to the point the credit code is provided back to the CIC sponsor by the CIC PM ) but will not address how each CIC sponsor decided to allocate credit to challenge over the other as this is internal to the CIC sponsor and how they desire to award the credits**
- Read through the credit best practices document and outline any potential gaps (**Jennifer – since you mentioned when you start handing the credit request this month you identified gaps compared to the current process, please send us those process gaps you identified to dive deep into root cause and update the process to cover those gaps)**

Could you help me identify how I should prioritize this work (what is needed immediately vs. what can be done over the next month)? I just need to plan for how to best support my immediate team along with this request - and along with the other request for documenting challenges in SFDC.

Thank you!

**Jennifer Whitespear**

Project Manager, Cloud Innovation Center

**From:** Whitespear, Jennifer

**Sent:** Thursday, June 27, 2019 12:55 PM

**To:** Maksosa, Lama <[@amazon.com](mailto:@amazon.com)>; Gallagher, Peter <[@amazon.com](mailto:@amazon.com)>; DeSorda, Mike <[@amazon.com](mailto:@amazon.com)>; Bass, Jason <[@amazon.com](mailto:@amazon.com)>; Sheeran, Jude <[@amazon.com](mailto:@amazon.com)>; Butler, Ben <[@amazon.com](mailto:@amazon.com)>; Berry, Renee <[@amazon.com](mailto:@amazon.com)>

**Subject:** FW: Credit utilization report

+Renee

**Jennifer Whitespear**

Project Manager, Cloud Innovation Center



@ Cal Poly Digital Transformation Hub (DxHub)

**From:** Maksosa, Lama <[@amazon.com](mailto:@amazon.com)>

**Sent:** Thursday, June 27, 2019 11:43 AM

**To:** Gallagher, Peter <[@amazon.com](mailto:@amazon.com)>; Whitespear, Jennifer <[@amazon.com](mailto:@amazon.com)>; DeSorda, Mike <[@amazon.com](mailto:@amazon.com)>; Bass, Jason <[@amazon.com](mailto:@amazon.com)>; Sheeran, Jude <[@amazon.com](mailto:@amazon.com)>

**Cc:** Butler, Ben <[@amazon.com](mailto:@amazon.com)>

**Subject:** RE: Credit utilization report

+ Ben as forgot to CC Ben

**From:** Maksosa, Lama

**Sent:** Thursday, June 27, 2019 2:33 PM

**To:** Gallagher, Peter <[@amazon.com](mailto:@amazon.com)>; Whitespear, Jennifer <[@amazon.com](mailto:@amazon.com)>; DeSorda, Mike <[@amazon.com](mailto:@amazon.com)>; Bass, Jason <[@amazon.com](mailto:@amazon.com)>; Sheeran, Jude <[@amazon.com](mailto:@amazon.com)>

**Subject:** RE: Credit utilization report

Hello everyone,

The attached report excel version measures the Credit Utilization ratio against the credit codes requested to date to determine effective utilization of our AWS product for POC prototyping solutions, since Lama identified poor credit utilization created qualitative survey with Daniel (CalPoly intern) to see root cause of the poor utilization, survey and questions are in the attached email.

The excel report capture all historical credit request for Calpoly prior to lama handling the process July 2018, as well as all credit code request todate.

Action needed since todate this never supplied :

1. The report todate doesn't have any of the 6 published challenges POC credit code request, we need to identify the account associated with those published challenges.  
**Jennifer owner**
2. The report has historical request that missing information on the challenge recipient column, we need those information populated. **Jennifer owner**
3. **Jennifer** to reply to this email with Gaps identified as she started processing credit code requests hence she is now able to communicate directly with the credit recipient which was not an option to lama as she was never provided the POC for the credit recipient and all the communication was going through Paul to provide the credit codes to recipient as well as determining the credit code amount and respective challenge name on the credit request from.
4. CIC sponsor credit process will be reviewed by **Jude**, **Lama** will incorporate his revision and finalize and post the document for the team feedback before it is shared with the CIC sponsor by next week.
5. CIC credit process for the PM will be created to capture additional steps that the PM will do, and reviewing the gaps Jennifer is going to share to ensure they are addressed and captured, **Lama** will create a follow meeting next week for review.

Thanks,  
Lama

**Email where Ms.Berry started claiming PLAINTIFF work**

**From:** Butler, Ben >  
**Sent:** Wednesday, July 3, 2019 12:58 PM  
**To:** Maksosa, Lama <  
**Subject:** Re: CIC Initiative Wiki Content

Thank you, for bringing this to my attention.

I have to get on a call but we can discuss a little later if this does not clarify.

We changed that during the RACI call that you and I had with Renee. Sorry, I made the mistake of saying that you were doing Wisdom (Renee pinged me about that ,too) and that caused confusion.

We initially had you to be the primary at the beginning of the call, but later on in the call we changed it to Renee as you wanted to take on the Salesforce innovation challenge project. I'm pretty sure I did that change during the call and sorry if it was not clear.

The Salesforce tracking is really important to me so I would like you to spend more bandwidth on that and get that figured out.

Ben

**From:** Lama Maksosa >  
**Date:** Wednesday, July 3, 2019 at 9:20 AM  
**To:** "Butler, Ben" >  
**Subject:** FW: CIC Initiative Wiki Content

Hi Ben,

I am confused , on our Raci meeting , It was determined that I have the lead on the wiki and Renee the lead on wisdom page, then that was changed without notifying me other than the email below, as Renee created new wiki pages and now you are asking that she is the lead on wisdom, can you please clarify to how the updates for both will take place so I am clear.

Thanks,  
Lama



**From:** "Butler, Ben" <[@amazon.com](mailto:@amazon.com)>  
**Date:** Friday, May 24, 2019 at 5:56 PM  
**To:** "Berry, Renee" >  
**Cc:** AWS WWPS CIC Distro  
**Subject:** Re: CIC Initiative Wiki Content

Thank you, Renee

I have asked Renee to start updating content on our wiki. We will be transferring our updated tenants, FAQs, press release and I also want to get a good first version of each of the initiative wiki pages.

We're getting a lot of interest from the public sector team members worldwide regarding our program, as well as what's going on terms of challenges at our various initiatives and we need to develop the content to be able to point them to.

We are also working on a website and Lama is also working on getting us a Wisdom page, but in the meantime we need to get the content developed for our wikis.

Thank you,  
 Ben

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**Print screen of the wiki I created below for the global as well as the local, hence the wisdom page was created by Erin Mantz who is our Marketing person and not by Renee Berry:**

- Attached the global wiki ppt that I have created power point
- Also attached the EMEA wiki I have created in power point.

**Appendix 1 - Email 2 with my manager and HR on PIP status:**

**From:** Lama Maksosa <[@amazon.com](mailto:@amazon.com)>  
**Date:** Wednesday, April 22, 2020 at 5:54 PM

983 **To:** "Butler, Ben">  
 984 **Cc:** "Chan, Joyce" >, Josh Weatherly >  
 985 **Subject:** RE: Pip tasks status

986  
 987 Hi Ben,

988  
 989 I have replied to your points in blue below:

990  
 991 Thanks,  
 992 Lama

993  
 994 **Email status report showing completion of PIP:**

995  
 996 **From:** Maksosa, Lama  
 997 **Sent:** Saturday, May 2, 2020 11:50 AM  
 998 **To:** Butler, Ben <@amazon.com>  
 999 **Cc:** Chan, Joyce <@amazon.co.jp>; Reuder, Maria <@amazon.com>  
 1000 **Subject:** RE: Pip tasks completed

1001  
 1002 Hi Ben,

1003  
 1004 PIP tasks summary:

- 1005 1. Bahrain project plan up to date and can be found [here](#)- new hired engagement  
 1006 manager starting June 1, Ron Tylor is an interim appointed from Preserve.  
 1007 Established new meeting frequency agreed upon by all starting next Tuesday.
- 1008 2. Embark plan steps and plans are up to date- reviewed with you on April 9 and  
 1009 29.
- 1010 3. Newsletter was completed and shared with you and the team per the timeline  
 1011 (attached email).
- 1012 4. Salesforce instruction for the CIC and the DI attached. Feedback captured on  
 1013 WorkDocs [here](#).
- 1014 5. RACI charts completed and shared with the team after two review meetings  
 1015 with you on 4/2, 4/30.
  - 1016 a. RACI was shared with the team to provide new input related to new roles  
 1017 as a result of the new org released last week email subject line team  
 1018 input needed by May15. And also email subject line Salesforce CIC  
 1019 challenges entries as of April 30 where Jason mentions his new task  
 1020 replying to my initial Salesforce activity report that I shared with the  
 1021 team.
  - 1022 b. RACI chart was shared with the WWPS DI team during weekly meeting  
 1023 4/13, and action reminder was requested in the email attached subject  
 1024 line WWPS DI meeting notes 4-20, and other follow up on email subject  
 1025 line WWPS DI RACI update request by May 15.
  - 1026 c. Global RACI chart was shared with Renee for her input last Friday after  
 1027 meeting with her, and asked her to send her input [here](#) but she didn't



provide any input to what I already had there so I created new one and uploaded it here along with the CIC PM RACI.

Thanks,  
Lama

**Email status report replying to the unfair assessment that my manager replied to me prior to the final week of my PIP milestones, where he provided outrageous feedback.**

**From:** Butler, Ben <[@amazon.com](mailto:@amazon.com)>  
**Sent:** Friday, April 17, 2020 3:16 PM  
**To:** Maksosa, Lama <[@amazon.com](mailto:@amazon.com)>  
**Cc:** Chan, Joyce <[@amazon.co.jp](mailto:@amazon.co.jp)>  
**Subject:** Re: Pip tasks status

Hi Lama,

Thank you for the follow up. I would like to share with you and Joyce the summary of our discussions the past couple of weeks.

- Task 1: You are meeting the bar: I have received positive feedback from them, but Jude thought the meetings could be more valuable if there were decisional meetings then just reporting out action items

Task 2: You are meeting the bar: The Embark plans and update mechanism seem to be in place and we will use Jubleen's new hire orientation plan as a test to see how the plan is working[LM] With respect to Task 2, I made several adjustments to improve on-boarding and communication mechanisms:

1. I updated the four Embark plans with updated tasks for all new hire CIC team members.
2. For each plan, I removed all DI team and other leadership from the "to meet" tasks.
3. I added CPC exam information to all four plans.
4. I validated managerial training links with Ben and the training team and then removed the expired links for manager training (I can't view those links since I am not a manager).
5. I validated that the TVBD wiki was retired and then removed the obsolete link from all plans.
6. I have created feedback survey on Qualtrics and added it to each Embark plan to more effectively close the feedback loop and create a mechanism for continual improvement.
7. For each plan, I created DL lists with instructions on how to join and maintain shared team calendar documentation.



- 1072 8. I added the Quip training tracker link that I created so that new team members  
 1073 can add their info, added contact link on quip to all plans, and  
 1074 validated/updated all the links to ensure a smooth user experience.
- 1075 9. Created document for all our distribution list, shared calendar and outlined  
 1076 instructions on how to join each, and how to add the shared calendar and  
 1077 added it to all plans.
- 1078 10. I revised Jay's Embark plan to contain both training from CIC and BTS  
 1079 after it was assigned by his manager and ensured all CIC tasks were added to  
 1080 Jay's plan.
- 1081 11. Assigned Jubleen new Embark plan.
- 1082 • Task 3: Still to be determined: I saw the soliciting of the inputs to the  
 1083 newsletter and look forward to the draft you prepare given you know the  
 1084 expectation of quality [LM] (attached the email with link to the newsletter)
  - 1085 • Task 4: Not on track as this is still an area of improvement - Please send me  
 1086 the Word version of the Salesforce documents in PDF attached and I will  
 1087 provide a more detailed feedback response on those
    - 1088 ○ Overall, there are still some grammar and word choice that needs  
 1089 improved
  - 1090 • I saw the feedback from Lorena and Amie which overall positive but please  
 1091 respond back to their questions when you can [LM] (I have replied to them)
  - 1092 ○ [LM] based on the PIP, I am scheduling the Doc Review with the team for  
 1093 this Friday, 22 April. I will send a meeting invite on Tuesday with the  
 1094 requisite Salesforce documents attached.
  - 1095 • Task 5: TBD, I know we are meeting on Monday, thank you for starting this  
 1096 one as well.
  - 1097 • Overall:
    - 1098 ○ While you have had a bias for action on being proactive  
 1099 in your communication to me and your stakeholders, my overall concern  
 1100 is still centered on earning trust with team members, such as:
      - 1101 ▪ Your communication style with teammates still needs much  
 1102 improvement
- 1103 1. I received unsolicited feedback from Noah (on DI wiki inputs) [LM] You received  
 1104 unsolicited feedback from Noah regarding wiki inputs and shared the Chime  
 1105 screen shot. I'm somewhat confused as to the meaning. Since he was working  
 1106 on the content, I thought it appropriate to ask him to add the Venn diagram I  
 1107 created to the wiki. Should I have approached this differently? and Monica (on  
 1108 DI logo development) about the communication churn and difficulties with  
 1109 getting thorough and clear information the first time (if true) between  
 1110 you [LM] Monica expressed concern over communication churn and difficulties  
 1111 with getting thorough and clear information the first time. I think we had a  
 1112 miscommunication as Monica was expecting a design logo that is different than  
 1113 the generic logo. I explained that I was told, after many discussions with  
 1114 several branding teams, that the logo shown below is the only approved design  
 1115 for an externally shared AWS program. I wish Monica would have engaged me  
 1116 directly as I would have gladly clarified the situation again and worked with her  
 1117 to think creatively about other options to incorporate her vision in other ways.



I have tried to ensure full transparency by sharing this information via email to the whole DI team and copying you as well, but I am open to other suggestions on how to collaborate more effectively on this topic.

[LM]

- The way you communicate to others gets escalated to a defensive tone, and it makes team members want to start avoiding you directly so as to not upset you and they ask me if it is okay if they don't respond to you. [LM] if this is the case, why they don't send an email to you and me to rather than complaining to you behind my back? can you please cite the situation where I got defensive? I explained in the past the issue I had with Jennifer and Renee on discrediting my work, affecting my deliverable when pushing back on Salesforce entry for challenges for few months (attached email I sent you regarding that).

It's deeply concerning to me that my teammates don't work with me directly when they have a concern with me or my performance. Amazon is a data driven company that privileges direct communication and honesty; I am vocally self-critical of my mistakes and very open to feedback, but I do expect the professional courtesy of receiving that feedback directly when it is valid. Off-handed remarks to you are not actionable feedback and tend to lack really critical context and defeat the purpose. I am committed to working with this team to find the right forum where all voices and perspectives can be heard and balanced against the priorities of this team. We know you rely on these perspectives so you can make the best decisions for the organization.

- I have directly given you feedback on this communication churn/difficulty when you kept asking me questions, example attached [LM] I had to reach out to you on this one because you only had two dates in the PIP , and I needed clarification regarding what exactly those dates represent, as you see in my newsletter email attached I had four dates that I aligned with you on later and those dates weren't reflected in the PIP, was it wrong that I reached out to double check on the missing information and asked for clarification to ensure I succeed in delivering on my PIP?

- You also do not acknowledge or take ownership on some of the issues presented, but rather it is also at the blame to someone else; therefore, nothing can be changed because all the fault is placed on others.

[LM] Will you please specify those situations where I am blaming others and haven't been taking ownership? Can you please cite those issues? While that never me I welcome to be shared those situations so I can learn from.



- At this trend, I remain very concerned that this behavior, mindset, and undermined relationships are not going to be improved and solved during your performance improvement period.
- Please clarify the mindset and behavior and undermined relationship I have exhibited to whom?

Finally, please don't mistake my persistence in obtaining clarity on your feedback, claims made against my performance, or deliverable due dates as defensiveness. My clear understanding of these facts directly influences my future livelihood with Amazon, and I am passionate about rectifying any real or perceived shortcoming in my performance. I urge you, as I asked before, when these situations are communicated to you, please open the conversation professionally with the complaining party and myself, ask me for explanation, and hold me accountable if the concerns are valid. If the claims are invalid, I trust you will instruct the team to more effectively work through disagreement. I am a team player and would like that we foster healthy work collaboration as team.

I look forward to successfully completing this plan and applying this valuable experience to our future endeavors. Thanks Lama

Kind regards,

Ben

**From:** Lama Maksosa >

**Date:** Saturday, April 11, 2020 at 1:18 PM

**To:** "Butler, Ben" <[@amazon.com](mailto:@amazon.com)>

**Subject:** Pip tasks status

Hi Ben,

- 1- Task1: status and project plan updated, you have the Asana link and you are copied on all emails, please let me know if you have any questions. Feedback received from Ghada, Jude and Nidal and you are copied on all emails and feedbacks.
- 2- Task2: Embark plan, you have the link to Asana updates instruction, attached are the survey results from new hires.
- 3- Task3: Newsletter input was due COB yesterday on [quip](#), I am spending this weekend to compile the input.
- 4- Task4: PM and DI Salesforce engagement model guide attached the draft version and requested feedback, I forwarded you two feedbacks received from two account managers, Lorena Costanza and Amie Carobrese, I also requested feedback from all the individual you asked me to get their feedbacks.
- 5- Task 5 RACI chart, I set up time to review the three WIP charts and sent you the two invites.

Have a happy Easter weekend.

Lama

## Email to HR asking to address hostility

**From:** Maksosa, Lama  
**Sent:** Saturday, April 25, 2020 2:27 PM  
**To:** Chan, Joyce <[chanjoyc@amazon.co.jp](mailto:chanjoyc@amazon.co.jp)>  
**Subject:** FW: Pip tasks status

Hi Joyce,

I signed up to improve at Amazon in good faith, but I find this PIP is rigged against me. I requested that I would be given the chance to work on it "peacefully", and it hasn't. I feel there has been a bias against me. At this point I like to be supported to move to another team so it is win-win situation, I have been working with other team members. I would like to discuss options with you on Monday.

I also find Ben's comments below quite inaccurate, and I can provide support evidence if needed.

Ben is usually objective person, but I am not sure about the shift in his attitude toward me that started lately, and why is he siding with some team members that I previously

BTW the logo Ben is referring to is for the WWPS DI program, I designed it to reflect the name spelled out with two options since the customers will have no idea what the and stickers files can be found [here](#)

Regarding Noah's chime, I think Ben meant to say "be and not by frugal ....", I usually try to be frugal on chime. I prefer calls too. This particular message was concerning the reference that in chime.

On tasks feedback in the word document, the step by step salesforce document was worked on in March, I had it for team feedback to finalize, Ben included that link when Salesforce document that is the road map Plan located [here](#), this is still WIP as I am going to add phase 2 requirements and road map to it, then finalize it.

Thanks,  
 Lama

**From:** Butler, Ben <[butlerb@amazon.com](mailto:butlerb@amazon.com)>  
**Sent:** Friday, April 24, 2020 3:48 PM  
**To:** Maksosa, Lama <[maksosal@amazon.com](mailto:maksosal@amazon.com)>  
**Cc:** Chan, Joyce <[chanjoyc@amazon.co.jp](mailto:chanjoyc@amazon.co.jp)>  
**Subject:** Re: Pip tasks status

Hi Lama,

I have attached my feedback on two documents and written up my feedback on the status of the 5 tasks as work products from the PIP. I followed up on feedback from

Regarding feedback discussed before, I created a table to explain my feedback.

Communication	Feedback received from teammates and/or stakeholders	Was the tasks accepted and actioned?	Ben's Feedback/Suggestions
1. Monica re: Logo	Monica expressed concern over communication churn and difficulties with getting thorough and clear information the first time. In her email to you on April 8 <sup>th</sup> she stated: "I am little confused as you and I spoke two weeks ago about ideas for a WWPS	No, because we decided to use the commercial DI logo?  I understand your point about wanting to be transparent and the difference between the program logo and a fun/swag logo. I made the decision to maintain	If you had a conversation about a certain direction, you should have had a different understanding that she had. (email WWPS DI Logo)  Furthermore, on the logo design that you shared was not acceptable horizontally out of proportion. I have given you feedback several times to help you as I see this as a trend that you have difficulty handling the program when designing the logo not sure why I was blamed?



	<p>DI logo and this is not what we discussed. Also, I thought we were going to review the response from the design team before sending out to the larger group?"</p> <p>In a conversation with me, she expressed that you and her had a conversation that you two were working together and when you sent it out to the greater team without her prior review surprised her.</p>	<p>the DI logo to keep consistent with the commercial DI team. I think we are spending too many cycles on this.</p>	
2. Noah re: DI wiki inputs	Noah has twice come to me about the communication churn that you have had with him on chime messages.	<p>Yes, I think it is more your style than what you stated or were trying to do. The tone with him was professional and pleasant so the issue was not about that in this instance, but it was about the frequency.</p> <p>For instance, you sent 27 chime messages to Noah on 4/7/2020 chime messages in a period of 34 minutes. Noah is trying to be nice and responsive, but I hope you can see that causes frustration on his end on this type of frequency.</p>	By frugal with your messaging on chime and on other's time. the only time I had longer chat is because I was having interac
<p>[BB]You also do not acknowledge or take ownership on some of the issues presented, but rather it is also at the blame to someone else; therefore, nothing can be changed because all the fault is placed on others.</p> <p>[LM] Will you please specify those situations where I am blaming others and haven't been taking ownership? Can you please cite those issues? While that <b>never me</b> I welcome to be shared those situations so I can learn from.</p>	<p>[BB]this trend, I remain very concerned that this behavior, mindset, and undermined relationships are not going to be improved and solved during your performance improvement period.</p> <p>Please clarify the mindset and behavior and undermined relationship I have exhibited to whom?</p> <p>Finally, please don't mistake my persistence in obtaining clarity on your feedback, claims made against my performance, or deliverable due dates as defensiveness. My clear understanding of these facts directly influences my future livelihood with Amazon, and I am passionate about rectifying any</p>	<p>Yes. The situations are from the feedback I have given you over the last 14 months.</p> <p>Your response is usually: not my fault, it is others, people are ganging up on me, and even in your response, you state <b>never me</b>.</p>	<p>I do believe the claims have validity as I have observed enough of you again.</p> <ul style="list-style-type: none"> <li>DI Logo (Monica) ( email referenced in the section above)</li> <li>Chime Churn (me, Noah) chat script and notes in section al</li> <li>Issues with credit issuance (Amie) [LM] I don't recall any is: to be processed because they are against the CIC agreeme</li> <li>Issues with Salesforce documentation (Jennifer, Renee)ple:</li> <li>Issues with credits documentation (Jude, Peter, Jason B)</li> </ul> <p><i>[LM] we had plenty of different opinions, I said the appendix and terms included in the CIC business case, this is the case even when they do na</i></p> <ul style="list-style-type: none"> <li>Sending out that yc</li> </ul> <p><i>[LM] yes it was shocking, I chimed Noah, and send email to Victoria bec their own from the beginning and excluding me, there was no set expec reporting needed and support.</i></p> <ul style="list-style-type: none"> <li>Sending Jason Bass 63 text messages so he had to turn his</li> <li>Outdated Embark plans – (members coming to me) [LM] <i>fi only, why I am blamed for that, besides if Ben or other team once a month at the hour I allocate to do so, otherwise he n</i></li> <li>Poor verbal and written communication (multiple team me</li> </ul>

real or perceived shortcoming in my performance. I urge you, as I asked before, when these situations are communicated to you, please open the conversation professionally with the complaining party and myself, ask me for explanation, and hold me accountable if the concerns are valid. If the claims are invalid, I trust you will instruct the team to more effectively work through disagreement. I am a team player and would like that we foster healthy work collaboration as team.

*adequate time to write and proof read and so I can come w with team input at the last minutes and have very short tin*

- The outburst from you on the conference call when Peter v report had portion that was inherited since I started coveri only talking about the missing info without providing backg had to intervene and explain the purpose of the meeting ar
- Emotional outbursts complaining to me and to others on h instance with the new DI to cause me to be placed on PIP w collaborate and share ideas they just criticize ( if you open i meeting, and I said ok let's dive deep and improve the proc till she answered that there was no process gap except thei feedback for in the attached slide) again I am not against ti blamed for it later and had to defend myself? That is what

The defensiveness is not from the persistence. My statement about y a topic, toxic statements saying you don't trust me, people are gangin behaviors.

I have been professional with you, exhibited patience and have not in: *my thumb broken during that time, no one covered for me for the 2x2*

You quickly get into escalated tones and you stop listening and you ju: people to know that it is not just my opinion. This is not new or sudde were not being respected. [LM] in my Feb2019 my surprise what I was *improvement that I shouldn't be very structured. I am again surprised*

Kind regards,  
Ben

From: Lama Maksosa <maksosal@amazon.com>  
Date: Wednesday, April 22, 2020 at 5:54 PM  
To: "Butler, Ben" <butlerb@amazon.com>  
Cc: "Chan, Joyce" <chanjoyc@amazon.co.jp>, Josh Weatherly <joshwe@amazon.com>  
Subject: RE: Pip tasks status

Hi Ben,

I have replied to your points in blue below:

Thanks,  
Lama

From: Butler, Ben <butlerb@amazon.com>  
Sent: Friday, April 17, 2020 3:16 PM  
To: Maksosa, Lama <maksosal@amazon.com>  
Cc: Chan, Joyce <chanjoyc@amazon.co.jp>  
Subject: Re: Pip tasks status

Hi Lama,

Thank you for the follow up. I would like to share with you and Joyce the summary of our discussions the past couple of weeks.

- Task 1: You are meeting the bar: I have received positive feedback from them, but Jude thought the meetings could be more
- Task 2: You are meeting the bar: The Embark plans and update mechanism seem to be in place and we will use Jubleen's new hire orientation plan as a test to see how t
  1. I updated the four Embark plans with updated tasks for all new hire CIC team members.
  2. For each plan, I removed all DI team and other leadership from the "to meet" tasks.
  3. I added CPC exam information to all four plans.
  4. I validated managerial training links with Ben and the training team and then removed the expired links for manager training
  5. I validated that the TVBD wiki was retired and then removed the obsolete link from all plans.
  6. I created feedback survey on Qualtrics and added it to each Embark plan to more effectively close the feedback loop and crea
  7. For each plan, I created DL lists with instructions on how to join and maintain shared team calendar documentation.
  8. I added the Quip training tracker link that I created so that new team members can add their info, added contact link on quip
  9. Created document for all our distribution list, shared calendar and outlined instructions on how to join each, and how to add i
  10. I revised Jay's Embark plan to contain both training from CIC and BTS after it was assigned by his manager and ensured all CIC
  11. Assigned Jubleen new Embark plan.
- Task 3: Still to be determined: I saw the soliciting of the inputs to the newsletter and look forward to the draft you prepare g
- Task 4: Not on track as this is still an area of improvement - Please send me the Word version of the Salesforce documents ir
  - Overall, there are still some grammar and word choice that needs improved
- I saw the feedback from Lorena and Amie which overall positive but please respond back to their questions when you can [L
  - [LM] based on the PIP, I am scheduling the Doc Review with the team for this Friday, 22 April. I will send a meeting
- Task 5: TBD, I know we are meeting on Monday, thank you for starting this one as well.
- Overall:
  - While you have had a bias for action on being proactive in your communication to me and your stakeholders, my
    - Your communication style with teammates still needs much improvement
- 1. I received unsolicited feedback from Noah (on DI wiki inputs) [LM] You received unsolicited feedback from Noah regarding w
  - add the Venn diagram I created to the wiki. Should I have approached this differently? and Monica (on DI logo development)
    - over communication churn and difficulties with getting thorough and clear information the first time. I think we had a miscon
    - teams, that the logo shown below is the only approved design for an externally shared AWS program. I wish Monica would ha
    - other ways. I have tried to ensure full transparency by sharing this information via email to the whole DI team and copying yc

[LM]

- The way you communicate to others gets escalated to a defensive tone, and it makes team members v
  - email to you and me to rather than complaining to you behind my back? can you please cite the situati
  - Salesforce entry for challenges for few months (attached email I sent you regarding that).
  - It's deeply concerning to me that my teammates don't work with me directly when they have a concern
  - open to feedback, but I do expect the professional courtesy of receiving that feedback directly when it i
  - team to find the right forum where all voices and perspectives can be heard and balanced against the p

[LM] I had to reach out to you on this one because you only had two dates in the PIP, and I needed clarification regarding what exactly those dates represent, as you see in



check on the missing information and asked for clarification to ensure I succeed in delivering on my PIP?

- You also do not acknowledge or take ownership on some of the issues presented, but rather it is also ;
- [LM] Will you please specify those situations where I am blaming others and haven't been taking ownership? Can you please cite those issues? While that never me I welc
- At this trend, I remain very concerned that this behavior, mindset, and undermined relationships are not going to
- Please clarify the mindset and behavior and undermined relationship I have exhibited to whom?

Finally, please don't mistake my persistence in obtaining clarity on your feedback, claims made against my performance, or de  
rectifying any real or perceived shortcoming in my performance. I urge you, as I asked before, when these situations are com  
cerns are valid. If the claims are invalid, I trust you will instruct the team to more effectively work through disagreement.

I look forward to successfully completing this plan and applying this valuable experience to our future endeavors. Thanks Lama

Kind regards,  
Ben

From: Lama Maksosa <maksosal@amazon.com>  
Date: Saturday, April 11, 2020 at 1:18 PM  
To: "Butler, Ben" <butlerb@amazon.com>  
Subject: Pip tasks status

Hi Ben,

- 1- Task1: status and project plan updated, you have the Asana link and you are copied on all emails, please let me know if y
- 2- Task2: Embark plan, you have the link to Asana updates instruction, attached are the survey results from new hires.
- 3- Task3: Newsletter input was due COB yesterday on [quip](#), I am spending this weekend to compile the input.
- 4- Task4: PM and DI Salesforce engagement model guide attached the draft version and requested feedback, I forwarded y  
their feedbacks.
- 5- Task 5 RACI chart, I set up time to review the three WIP charts and sent you the two invites.

Have a happy Easter weekend.

Lama



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**Appendix 3 Email to VP of HR**

**From:** Wilson (HR), Ian <[@amazon.com](mailto:@amazon.com)>  
**Sent:** Tuesday, May 19, 2020 7:22 PM  
**To:** Maksosa, Lama l<[@amazon.com](mailto:@amazon.com)>  
**Subject:** RE: Complaint - Please assist me

Hello Lama -

Thank you for reaching out with your concerns. MacKenzie Watson from our Employee Relations team will reach out to you to discuss further and gather the necessary details.

We take these matters seriously and appreciate the opportunity to review it more closely.

Regards,  
 Ian

**From:** Maksosa, Lama <[@amazon.com](mailto:@amazon.com)>  
**Sent:** Tuesday, May 19, 2020 2:17 PM  
**To:** Wilson (HR), Ian <[@amazon.com](mailto:@amazon.com)>  
**Subject:** Complaint - Please assist me

Hello Ian, hope your day is well,

I wanted to report that I have been subjected to prejudice and discrimination translated in harassing work environment, unfair work load, defamation and assuming credits for my work.

Also, sexual harassment from Jason Bass last February, I felt slightly his change of attitude towards me when I professionally rejected his offer, but it wasn't loudly portrayed till he provided his demeaning feedback on my work in the PIP. I didn't report it then because I was scared of retaliation so I said to myself I will keep professional with him as long as this will not impact my work, which was the same attitude I had to do with the other two team members that I raised concern with my manager since he tried to help address when he had time but they didn't stop.

Also I feel I been retaliated as a results of concerns I expressed in terms the following:

- ☐ Cal Poly credits don't map to any solutions
- ☐ No solutions developed to date which was contradicting with the objective as stated in the agreement.